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March 1, 2011

ELECTRONIC SUBMISSION

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

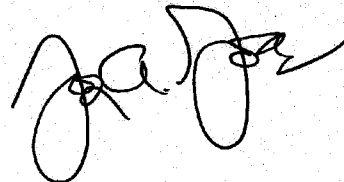
**Re: Japan Telecom America, Inc.
Certification of CPNI Filing
EB Docket No. 06-36**

Dear Ms. Dortch:

Japan Telecom America, Inc., by its undersigned counsel, hereby files the enclosed annual customer proprietary network information compliance statement.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



Joseph A. Godles
Counsel for
Japan Telecom America, Inc.

cc: FCC@BCPIWEB.COM

Customer Proprietary Network Information Compliance Statement
EB Docket No. 06-36

Japan Telecom America, Inc. ("JTA") is filing this annual customer proprietary network information ("CPNI") compliance statement. Although JTA holds Section 214 authorizations permitting it to provide international common carrier services, the Commission's CPNI requirements are inapplicable to JTA for the following reasons:

- The CPNI requirements apply to "telecommunications carriers" as defined in Section 3(44) of the Communications Act. *See* 47 C.F.R. § 64.2003(k). Section 3(44) defines a telecommunications carrier as a "provider of telecommunications services," *i.e.*, common carrier services (*see* 47 U.S.C. §153(46)), and states that "[a] telecommunications carrier shall be treated as a common carrier under this [Communications] Act only to the extent that it is engaged in providing telecommunications services."
- JTA is not engaged in providing telecommunications services. It has no active common carrier circuits, and all of its services are either information services or non-common carrier services.
- Even if the CPNI requirements were applicable to JTA's information services and non-common carrier services, JTA's sole customer for these services is its parent company, Softbank Telecom Corp. ("SBT") (formerly known as Japan Telecom), which is an authorized carrier in Japan.
- Because it has no U.S. customers, JTA does not have access to, or use in any way, CPNI as defined by Section 222(h)(1) of the Communications Act. *See* 47 U.S.C. § 222(h)(1).
- SBT does not have any customers in the United States, either. Rather, its customers all are located in Japan.